

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

Rochelle Pouget

v.

Kysa Crusco, et al.

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Civil Action No. 22-cv-00382-SM

DEFENDANTS TOWN OF NEW BOSTON, JAMES BRACE AND
TIMOTHY LOVELESS’S MOTION TO DISMISS

NOW COME Defendants Town of New Boston, James R. Brace, and Timothy Loveless (“New Boston Defendants”), through counsel, and move to dismiss all claims brought against them in this matter. In support hereof, Defendants rely on the accompanying Memorandum of Law and further state as follows:

1. This case is the latest of a series of legal actions by Plaintiff against judges, prosecutors, attorneys, investigators, guardians ad litem, and numerous other persons she perceives to have mistreated during her myriad legal battles.

2. This latest suit – her first in the federal court – commenced with the filing of a Complaint in September 2022 seemingly aimed at preventing an imminent foreclosure on her home in New Boston. [Doc. No. 1].

3. Unsuccessful, she filed two Motions to Amend through which she expanded both the subject matter of the litigation and the Defendants subject thereto. [Doc. Nos. 8 & 9].

4. The combination of these three documents results in a scattershot complaint that contains bald allegations of misconduct against a wide array of Defendants and numerous requests for relief but no clear legal basis therefore.

5. The allegations against the New Boston Defendants are particularly thin, consisting

only of dated complaints and conclusory statements.

6. Given the lack of specific allegations or particularized viable legal claims, the New Boston Defendants should be dismissed from this action.

WHEREFORE the New Boston Defendants respectfully request that this Honorable Court:

- A. Dismiss the New Boston Defendants' from this action; and
- B. Grant such other relief as justice requires.

Respectfully submitted,

**TOWN OF NEW BOSTON,
JAMES BRACE and
TIMOTHY LOVELESS**

By their Attorneys,

CULLEN COLLIMORE SHIRLEY PLLC

Date: May 26, 2023

By: /s/ Brian J.S. Cullen

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent via mail on this day to all counsel of record by ECF.

Date: May 26, 2023

By: /s/ Brian J.S. Cullen

Brian J.S. Cullen